

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

J.W., A MINOR, by and through her guardian
Angela Johnson, CRYSTAL SCHULTZ,
MICHELE EUSEBE, JUSTIN MEDINA,
ARTHUR PODROYKIN, and KATHERINE
CHAUDHRY, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

LIVANOVA USA, INC.

Defendant.

CIVIL ACTION NO. 4:24-CV-02250

JOINT MOTION TO STAY AND NOTICE OF MEDIATED SETTLEMENT

Plaintiffs and Defendant jointly move to stay all case deadlines in the above-captioned proceedings based on a mediated settlement. The Parties have mediated and reached an agreement in principle on the material terms of a class wide settlement. The Parties intend to file their comprehensive settlement agreement along with Plaintiffs' Motion for Preliminary Approval within 60 days of today or December 2, 2024. In light of the mediated settlement, the Parties respectfully move the Court for an order staying all deadlines pending the filing of the Motion for Preliminary Approval and thereafter a Motion for Final Approval of the settlement.

Dated: October 4, 2024

Respectfully submitted,

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/s/ Joe Kendall

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2024, the foregoing document was electronically filed using the Court's electronic case filing (ECF) system, which automatically sends notice of electronic filing via the email addresses of all counsel of record.

/s/ Joe Kendall
Joe Kendall